FINAL DRAFT CAAPP PERMIT
August 10, 2005

217/782-2113

"RENEWAL"
CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

PERMITTEE:

Signode
Attn: Mark Hollo, Senior Plant Engineer
7701 West 71st Street
Bridgeview, Illinois 60455

I.D. No.: 031027AAG
Application No.: 95090018
Date Received:
Date Issued: TO BE DETERMINED
Expiration Date[1]: TO BE DETERMINED

Operation of: Steel Strapping Manufacturing Plant
Source Location: 7701 West 71st Street, Bridgeview, Cook County, 60455
Responsible Official: Kenneth A. Hoffman, Group Vice President

This permit is hereby granted to the above-designated Permittee to OPERATE a Steel Strapping Manufacturing Plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this permit, please contact Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:psj

cc: Illinois EPA, FOS, Region 1
CES
Lotus Notes

[1] Except as addressed in Condition 8.7 of this permit.

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1.0 INRODUCTION

1.1 Source

Signode
7701 West 71st Street
Bridgeview, Illinois 60455
708/458-7320

I.D. No.: 031027AAG
County: Cook
Standard Industrial Classification: 3499, Fabricated Metal Products, Not Elsewhere Classified

1.2 Owner/Parent Company

Illinois Tool Works, Inc.
3600 West Lake Avenue
Glenview, Illinois 60025

1.3 Operator

Signode
7701 West 71st Street
Bridgeview, Illinois 60455

Mark Hollo, Senior Plant Engineer
708/458-7320 Ext.230

1.4 Source Description

Signode is located at 7701 West 71st Street in Bridgeview. The source produces steel strapping. During production, steel is cold rolled, slit, cleaned and heat treated, painted, and coiled. In addition to steel strapping, the source produces steel seals used for clamping the strap ends together.

1.5 Title I Conditions

As generally identified below, this CAAPP permit contains certain conditions for emission units at this source that address the applicability of permitting programs for the construction and modification of sources, which programs were established pursuant to Title I of the Clean Air Act (CAA) and regulations thereunder. These programs include 40 CFR 52.21, Prevention of Significant Deterioration (PSD) and 35 IAC Part 203, Major Stationary Sources Construction and Modification (MSSCAM), and are implemented by the Illinois EPA pursuant to Sections 9, 9.1, 39(a) and 39.5(7)(a) of the Illinois Environmental Protection Act (Act). These conditions continue in effect, notwithstanding the expiration date specified on the first page of this permit, as their authority derives from Titles I and V of the CAA, as well as Titles II and X of the Act. (See also Condition 8.7.)

a. This permit contains "Title I conditions" that reflect Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1."

b. This permit contains Title I conditions that revise Title I requirements established in permits previously issued for this source, which conditions are specifically designated as "T1R."

2.0 LIST OF ABBREVIATIONS AND ACRONYMS COMMONLY USED

ACMA	Alternative Compliance Market Account
Act	Illinois Environmental Protection Act [415 ILCS 5/1 et seq.]
AP-42	Compilation of Air Pollutant Emission Factors, Volume 1, Stationary Point and Other Sources (and Supplements A through F), USEPA, Office of Air Quality Planning and Standards, Research Triangle Park, NC 27711
ATU	Allotment Trading Unit
BAT	Best Available Technology
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]
CAAPP	Clean Air Act Permit Program
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
ERMS	Emissions Reduction Market System
HAP	Hazardous Air Pollutant
IAC	Illinois Administrative Code
I.D. No.	Identification Number of Source, assigned by Illinois EPA
ILCS	Illinois Compiled Statutes
Illinois EPA	Illinois Environmental Protection Agency
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 microns as measured by applicable test or monitoring methods
PSD	Prevention of Significant Deterioration
RMP	Risk Management Plan
SO_2	Sulfur Dioxide
T1	Title I – identifies Title I conditions that have been carried over from an existing permit
T1N	Title I New – identifies Title I conditions that are being established in this permit
T1R	Title I Revised – identifies Title I conditions that have been carried over from an existing permit and subsequently revised in this permit
USEPA	United States Environmental Protection Agency
VOM	Volatile Organic Material

3.0 CONDITIONS FOR INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

None

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

None

3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:

a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 mmBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 mmBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].

b. Storage tanks of any size containing virgin or re-refined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11)].

c. Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, dilutents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].

d. Gas turbines and stationary reciprocating internal combustion engines of less than 112 kW (150 horsepower) power output [35 IAC 201.210(a)(15)].

e. Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions, provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].

3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b). Note: These activities are not required to be individually listed.

3.2 Compliance with Applicable Requirements

Insignificant activities are subject to applicable requirements notwithstanding status as insignificant activities. In particular, in addition to regulations of general applicability, such as 35 IAC 212.301 and 212.123 (Condition 5.3.2), the Permittee shall comply with the following requirements, as applicable:

3.2.1 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322 (see Attachment 2) and 35 IAC Part 266. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.

3.2.2 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 218.301, which requires that organic material emissions not exceed 8.0 pounds per hour or, if no odor nuisance exists, do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.

3.3 Addition of Insignificant Activities

3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).

3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.

3.3.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission Unit(s)	Description	Unit Designation	Date of Construction	Emission Control Equipment
Fuel Combustion Emission Units	Space Heater #1	H-1	3/98	None
	Natural Gas-Fired Boiler #1	B-1	Prior to 4/14/72	None
	Natural Gas-Fired Boiler #2	B-2	Prior to 4/14/72	None
Grit Seal Lines	Grit Seal Line #1	GS-1	2/1988	Cyclone C-1
	Grit Seal Line #2	GS-2	2/1988	Cyclone C-1
Iron Phosphate Cleaning Tanks	Iron Phosphate Cleaning Tank (Apex Strapping Line)	A-1	8/1995	None
	Pilot Line Iron Phosphate Cleaning Tank (R&D Strapping Line)	PL-1	9/2001	None
Strapping Lines (Contact and Quench Pots)	Magnus 2 Strapping Line Contact Pot	M2-1	Prior to 4/14/72	None
	Magnus 2 Strapping Line Quench Pot	M2-2	Prior to 4/14/72	None
	Magnus 3 Strapping Line Contact Pot	M3-1	Prior to 4/14/72	None
	Magnus 3 Strapping Line Quench Pot	M3-2	Prior to 4/14/72	None
	Magnus 4 Strapping Line Contact Pot	M4-1	2/2000	Smog-Hog SH-1
	Magnus 4 Strapping Line Quench Pot	M4-2	2/2000	Smog-Hog SH-1
Strapping Coating Lines and Wax Applicators	Paint Applicator (Apex Strapping Line)	A-2	Prior to 4/14/72	None
	Electric Paint Drying Oven (Apex Strapping Line)	A-3	2/1985	None
	Wax Applicator/Electric Dryer (Apex Strapping Line)	A-4	Prior to 4/14/72	None
	Paint Dip Tank (Magnus 2 Strapping Line)	M2-3	Prior to 4/14/72	None
	Natural Gas-Fired Paint Drying Oven (Magnus 2 Strapping Line)	M2-4	Prior to 4/14/72	None
Strapping Coating Lines and Wax	Wax Applicator/Electric Dryer (Magnus 2 Strapping Line)	M2-5	Prior to 4/14/72	None

Emission Unit(s)	Description	Unit Designation	Date of Construction	Emission Control Equipment
Wax Applicators (Continued)	Paint Dip Tank (Magnus 3 Strapping Line)	M3-3	Prior to 4/14/72	None
	Natural Gas-Fired Paint Drying Oven (Magnus 3 Strapping Line)	M3-4	Prior to 4/14/72	None
	Wax Applicator/Electric Dryer (Magnus 3 Strapping Line)	M3-5	Prior to 4/14/72	None
	Paint Dip Tank (Magnus 4 Strapping Line)	M4-3	2/2000	None
	Electric Paint Drying Oven (Magnus 4 Strapping Line)	M4-4	2/2000	Thermal Oxidizer
	Wax Applicator/Electric Dryer (Magnus 4 Strapping Line)	M4-5	2/2000	None
	Wax Applicator/Electric Dryer (1,000# Rewinder)	R-1	07/2001	None
	Wax Applicator/Electric Dryer (Print Line)	PRINT-1	06/2001	None
	Wax Applicator/Electric Dryer (#2 Slitting Line)	SLIT-2	02/2003	None
Cold Rolling Mill	Cold Rolling Mill	CRM	Prior to 4/14/1972	Mist Eliminators ##1, 2
Punch Press Departments	Department #1	PPD-1	Prior to 01/01/1994	None
	Department #2	PPD-2	07/01/2001	None
Gasoline Storage Tank	Gasoline Non-Retail Dispensing Operations	UST 1A/1B	10/1995	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Applicability of the Clean Air Act Permit Program (CAAPP)

This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and HAP emissions.

5.2 Area Designation

This permit is issued based on the source being located in an area that, as of the date of permit issuance, is designated nonattainment for the National Ambient Air Quality Standards for ozone (moderate nonattainment), PM_{10}, and $PM_{2.5}$ and attainment or unclassifiable for all other criteria pollutants of the National Ambient Air Quality Standards.

5.3 Source-Wide Applicable Provisions and Regulations

5.3.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions for Specific Emission Units) of this permit.

5.3.2 In addition, emission units at this source are subject to the following regulations of general applicability:

a. No person shall cause or allow the emission of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.

b. Pursuant to 35 IAC 212.123(a), no person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, except as allowed by 35 IAC 212.123(b) and 212.124.

c. Pursuant to 35 IAC 237.102, no person shall cause or allow open burning, except the Illinois EPA may grant permits for open burning in accordance with 35 IAC 237.201.

d. Except as otherwise provided in 35 IAC Part 212, no person shall cause or allow the emission into the atmosphere of PM10, from any process emission unit to exceed 68.7 mg/scm (0.03 gr/scf) during any one hour period [35 IAC 212.324(b)].

e. The mass emission limits contained in Condition 5.3.2(d) shall not apply to those emission units with no visible emissions other than fugitive particulate matter; however, if a stack test is performed, this Condition is not a defense finding of a violation of the mass emission limits contained in Condition 5.3.2(d) and 35 IAC 212.324(b)) [35 IAC 212.324(d)].

5.3.3 Fugitive Particulate Matter Operating Program

a. This source shall be operated under the provisions of an operating program prepared by the Permittee and submitted to the Illinois EPA for its review. Such operating program shall be designed to significantly reduce fugitive particulate matter emissions [35 IAC 212.309(a)]. The Permittee shall comply with a fugitive particular matter operating program submitted to the Illinois EPA and incorporated by reference into this permit, and any amendments to the program submitted pursuant to paragraph (b) below.

b. The operating program shall be amended from time to time by the Permittee so that the operating program is current. Such amendments shall be consistent with the requirements set forth by this Condition and shall be submitted to the Illinois EPA [35 IAC 212.312].

c. All normal traffic pattern roads and parking facilities located at this source shall be paved or treated with water, oils, or chemical dust suppressants. All paved areas shall be cleaned on a regular basis. All areas treated with water, oils, or chemical dust suppressants shall have the treatment applied on a regular basis, as needed, in accordance with the operating program [35 IAC 212.306].

5.3.4 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.3.5 Risk Management Plan (RMP)

Should this stationary source, as defined in 40 CFR 68.3, become subject to the federal regulations for Chemical Accident Prevention in 40 CFR Part 68, then the owner or operator shall submit the items below. This condition is imposed in this permit pursuant to 40 CFR 68.215(a)(2)(i) and (ii).

a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or

b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by Condition 9.8.

5.3.6 Future Emission Standards

a. Should this stationary source become subject to a new or revised regulation under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by Condition 9.8. This permit may also have to be revised or reopened to address such new or revised regulations (see Condition 9.12.2).

b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable regulations under 40 CFR Parts 60, 61, 62, or 63, or 35 IAC Subtitle B that were promulgated after the date issued of this permit.

5.3.7 PM_{10} Contingency Measure Plan

This stationary source meets the criteria in 35 IAC 212.700 and is required to prepare and submit a contingency measure plan reflecting the PM_{10} emission reductions as set forth in 35 IAC 212.701 and 212.703. The plan submitted to the Illinois EPA is incorporated by reference into this permit and shall be implemented by the Permittee in accordance with 35 IAC 212.704 following notification by the Illinois EPA. The source shall comply with the applicable requirements of 35 IAC Part 212, Subpart U.

5.4 Source-Wide Non-Applicability of Regulations of Concern

Source-wide non-applicability of regulations of concern are not set for this source. However, there may be unit specific non-applicability of regulations of concern set forth in Section 7 of this permit.

5.5 Source-Wide Control Requirements and Work Practices

Source-wide control requirements and work practices are not set for this source. There may be requirements for unit specific control requirements and work practices set forth in Section 7 of this permit.

5.6 Source-Wide Production and Emission Limitations

5.6.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.6.1) are set for the purpose of establishing fees and are not federally enforceable (see Section 39.5(18) of the Act).

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	183.05
Sulfur Dioxide (SO_2)	----
Particulate Matter (PM)	77.61
Nitrogen Oxides (NO_x)	29.81
HAP, not included in VOM or PM	----
Total	290.47

5.6.2 Emissions of Hazardous Air Pollutants

Source-wide emission limitations for HAPs as listed in Section 112(b) of the CAA are not set. This source is considered to be a major source of HAPs.

5.6.3 Other Source-Wide Production and Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, state rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.7 Source-Wide Testing Requirements

5.7.1 Pursuant to 35 IAC 201.282 and Section 4(b) of the Act, every emission source or air pollution control equipment shall be subject to the following testing requirements for the purpose of determining the nature and quantities of specified air contaminant emissions and for the purpose of determining ground level and ambient air concentrations of such air contaminants:

a. Testing by Owner or Operator: The Illinois EPA may require the owner or operator of the emission source or air pollution control equipment to conduct such tests in accordance with procedures adopted by the Illinois EPA, at such reasonable times as may be specified by the Illinois

EPA and at the expense of the owner or operator of the emission source or air pollution control equipment. All such tests shall be made by or under the direction of a person qualified by training and/or experience in the field of air pollution testing. The Illinois EPA shall have the right to observe all aspects of such tests [35 IAC 201.282(a)].

b. Testing by the Illinois EPA: The Illinois EPA shall have the right to conduct such tests at any time at its own expense. Upon request of the Illinois EPA, the owner or operator of the emission source or air pollution control equipment shall provide, without charge to the Illinois EPA, necessary holes in stacks or ducts and other safe and proper testing facilities, including scaffolding, but excluding instruments and sensing devices, as may be necessary [35 IAC 201.282(b)].

c. Any such tests are also subject to the Testing Procedures of Condition 8.5 set forth in the General Permit Conditions of Section 8.

5.8 Source-Wide Monitoring Requirements

Source-wide monitoring requirements are not set for this source. However, there may be provisions for unit specific monitoring set forth in Section 7 of this permit.

5.9 Source-Wide Recordkeeping Requirements

5.9.1 Annual Emission Records

The Permittee shall maintain records of total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit to demonstrate compliance with Condition 5.6.1, pursuant to Section 39.5(7)(b) of the Act.

5.9.2 Records for Source-Wide Control Requirements and Work Practices

a. The Permittee shall keep copy of the fugitive particulate matter operating plan, and any amendments to the plan, as required by Condition 5.3. The Permittee shall also keep a record of activities completed according to the plan.

b. The Permittee shall keep the following records pursuant to 35 IAC 212.316(g):

i. The owner or operator of any fugitive particulate matter emission unit subject to this Section shall keep written records of the application of control measures as may be needed for compliance with the opacity limitations of this Section and shall submit to the Agency an annual report containing a summary of such information.

ii. The records required under 212.316(g) shall include at least the following:

A. The name and address of the source;

B. The name and address of the owner and/or operator of the source;

C. A map or diagram showing the location of all emission units controlled, including the location, identification, length, and width of roadways;

D. For each application of water or chemical solution to roadways by truck: the name and location of the roadway controlled, application rate of each truck, frequency of each application, width of each application, identification of each truck used, total quantity of water or chemical used for each application and, for each application of chemical solution, the concentration and identity of the chemical;

E. For application of physical or chemical control agents: the name of the agent, application rate and frequency, and total quantity of agent, and, if diluted, percent of concentration, used each day; and

F. A log recording incidents when control measures were not used and a statement of explanation.

c. The Permittee shall keep the following records of maintenance and repair pursuant to 35 IAC 212.324(g):

i. Written records of inventory and documentation of inspections, maintenance, and repairs of all air pollution control equipment shall be kept in accordance with subsection 35 IAC 212.324(f).

ii. The owner or operator shall document any period during which any process emission unit was in operation when the air pollution control equipment was not in operation or was malfunctioning so as to cause an emissions level in excess of the emissions limitation. These records shall include documentation of causes for pollution control equipment not operating or such malfunction and shall state what corrective actions were taken and what repairs were made.

iii. A written record of the inventory of all spare parts not readily available from local suppliers shall be kept and updated.

iv. Copies of all records required by this Section shall be submitted to the Agency within ten (10) working days after a written request by the Agency.

5.9.4 Retention and Availability of Records

a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.

b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.10 Source-Wide Reporting Requirements

5.10.1 General Source-Wide Reporting Requirements

a. The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the source with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. There are also reporting requirements for unit specific emission units set forth in Section 7 of this permit.

b. A quarterly report shall be submitted to the Agency stating the following: the dates any necessary control measures were not implemented, a listing of those control measures, the reasons that the control measures were not implemented, and any corrective actions taken. This information includes, but is not limited to, those dates when controls were not applied based on a belief that application of such control measures would have been unreasonable given prevailing atmospheric conditions, which shall constitute a defense to the requirements of this Section. This report shall be submitted to the Agency thirty (30) calendar days from the end of a quarter. Quarters end March 31, June 30, September 30, and December 31 [35 IAC 212.316(g)(5)].

c. Upon written request by the Illinois EPA, a report shall be submitted to the Illinois EPA for any period specified in the request stating the following: the dates during which any process emission unit was in operation when the air pollution control equipment was not in operation or was not operating properly, documentation of causes for pollution control equipment not operating or not operating properly, and a statement of what corrective actions were taken and what repairs were made [35 IAC 212.324(g)(6)].

5.10.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information, including HAP emissions, for the previous calendar year.

5.11 Source-Wide Operational Flexibility/Anticipated Operating Scenarios

Source-wide operational flexibility is not set for this source. However, there may be provisions for unit specific operational flexibility set forth in Section 7 of this permit.

5.12 Source-Wide Compliance Procedures

Procedures for Calculating Emissions

Except as provided in Condition 9.1.3, compliance with the source-wide emission limits specified in Condition 5.6 shall be addressed on the recordkeeping and reporting requirements of Conditions 5.9 and 5.10, and compliance procedures in Section 7 (Unit Specific Conditions for Specific Emission Units) of this permit.

6.0 CONDITIONS FOR EMISSIONS CONTROL PROGRAMS

6.1 Emissions Reduction Market System (ERMS)

6.1.2 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to reasonable further progress toward attainment, as required by Section 182(c) of the CAA.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set in the sources' CAAPP permits. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emissions reductions from stationary sources required for reasonable further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source shall have sufficient ATUs in its transaction account to cover its actual VOM emissions during the preceding season. A transaction account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the transaction account database. The Illinois EPA will then retire ATUs in sources' transaction accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its transaction account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emissions reductions from an Emissions Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 35 IAC 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the "Alternative Compliance Market Account" (ACMA) (35 IAC 205.710). Sources may also transfer or sell the ATUs that they hold to other sources or participants (35 IAC 205.630).

6.1.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

6.1.3 Obligation to Hold Allotment Trading Units (ATUs)

a. Pursuant to 35 IAC 205.150(c)(1) and 35 IAC 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than the ATU equivalent of its VOM emissions during the preceding seasonal allotment period (May 1 - September 30), not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.

   i. VOM emissions from insignificant emission units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;

   ii. Excess VOM emissions associated with startup, malfunction, or breakdown of an emission unit as authorized in Section 7.0 of this permit, in accordance with 35 IAC 205.225;

   iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);

   iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and

   v. VOM emissions from certain new and modified emission units as addressed by Condition 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).

b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification, pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its seasonal VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.1.4 Market Transactions

a. The source shall apply to the Illinois EPA for and obtain authorization for a Transaction Account prior to conducting any market transactions, as specified at 35 IAC 205.610(a).

b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).

d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA, in accordance with 35 IAC 205.620, and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.1.5 Emissions Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation in accordance with the following:

a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by the notice, as follows:

i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or

ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emissions excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.

b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.

c. Pursuant to 35 IAC 205.720(c), within 15 days after receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.1.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Sections 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

b. The Permittee shall report emergency conditions at the source to the Illinois EPA, in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:

i. An initial emergency conditions report within two days after the time when such excess emissions occurred due to the emergency; and

ii. A final emergency conditions report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.1.7 Annual Account Reporting

a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emissions Report, seasonal VOM emissions information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:

i. Actual seasonal emissions of VOM from the source;

ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;

iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC 205.337;

iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;

v. If a source's baseline emissions have been adjusted due to a Variance, Consent Order, or CAAPP permit Compliance Schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and

vi. If a source is operating a new or modified emission unit for which three years of operational data is not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

b. This report shall be submitted by November 30 of each year, for the preceding seasonal allotment period.

6.1.8 Allotment of ATUs to the Source

a. i. The allotment of ATUs to this source is 658 ATUs per seasonal allotment period. This allotment allocation consists of the following elements:

A. 147 ATUs are being assigned based on the Illinois EPA's determination that the source's baseline emissions were 16.6446 tons per season. The source's allotment reflects 88% of the baseline emissions (12% reduction), except for the VOM emissions from specific emission units excluded from such reduction, pursuant to 35 IAC 205.405, including units complying with MACT or using BAT, as identified in Condition 6.10 of this permit.

B. Additional 47 ATUs have been allocated and transferred from the shutdown of the A. J. Gerrard facility (I.D.031027AAB).

C. Finally, 468 ATUs have been allocated and transferred from the shutdown of the ACME Packaging facility (I.D.031063ABU).

ii. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.

iii. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.

b. Contingent Allotments for New or Modified Emission Units

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units:

Emission Unit	Construction Permit No.	Date Issued
Magnus 4 Strapping Line Contact Pot; Magnus 4 Strapping Line Quench Pot	99030098	7/31/2001
Paint Dip Tank (Magnus 4 Strapping Line); Electric Paint Drying Oven (Magnus 4 Strapping Line); Wax Applicator/Electric Dryer (Magnus 4 Strapping Line)	99030098	7/31/2001
Pilot Line Iron Phosphate Cleaning Tank (R&D Strapping Line)	01080036	9/10/2001
Punch Press Department #2	01020025	4/13/2001

In accordance with 35 IAC Part 205, for the above referenced emission units, the source is required to hold the appropriate amount of ATUs for these emission units.

c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:

i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

ii. Deduction of ATUs as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and

iii. Transfer of ATUs to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.1.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of the ERMS [35 IAC 205.700(a)]:

a. Seasonal component of the Annual Emissions Report;

b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and

c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.1.10 Exclusions from Further Reductions

a. VOM emissions from the following emission units shall be excluded from the VOM emissions reductions requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy the following [35 IAC 205.405(a)]:

i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;

ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units, and internal combustion engines; and

iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.405(a) and (c)]:

Fuel Combustion Emission Units

b. VOM emissions from emission units using BAT for controlling VOM emissions shall not be subject to the VOM emissions reductions requirement specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in its ERMS application and the Illinois EPA has determined that the following emission units qualify for exclusion from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.405(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS FOR SPECIFIC EMISSION UNITS

7.1 Fuel Combustion Emission Units

7.1.1 Description

The natural gas-fired space heater is used to retain a comfortable working temperature in the facility. Emissions from this unit will be the byproducts of natural gas fuel combustion. Two natural gas-fired boilers are used for production of hot water for the source needs.

7.1.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit(s)	Description	Date of Construction	Emission Control Equipment
H-1, B-1, B-2	Space Heater #1 (5.0 mmBtu/hr)	3/98	None
	Natural Gas-Fired Boiler #1 (8.4 mmBtu/hr)	Prior to 4/14/72	None
	Natural Gas-Fired Boiler #2 (8.4 mmBtu/hr)	Prior to 4/14/72	None

7.1.3 Applicable Provisions and Regulations

a. An "affected fuel combustion emission unit" for the purpose of these unit specific conditions is a natural gas-fired boiler or heater as described in Conditions 7.1.1 and 7.1.2 above.

b. The affected fuel combustion emission unit is subject to opacity limit described in Condition 5.3.2(b) of this permit.

7.1.4 Non-Applicability of Regulations of Concern

a. Each affected fuel combustion emission unit is not subject to 35 IAC 217.141, Emissions of Nitrogen Oxides From Existing Fuel Combustion Emission Sources In Major Metropolitan Areas, because the actual heat input of such fuel combustion emission unit is less than 73.2 MW (250 mmBtu/hr).

b. Each affected fuel combustion emission unit is not subject to 35 IAC 216.121, because the actual heat input of each such fuel combustion emission unit is less than 2.9 MW (10 mmBtu/hr).

c. Pursuant to 35 IAC 218.303, any fuel combustion emission units are not subject to 35 IAC Part 218, Subpart G: Use of Organic Material.

d. The affected fuel combustion emission units are not subject to 40 CFR Part 60 Subpart Dc, because all such units do not fulfill an applicability criteria of at least 10 mmBtu/hr of a maximum design heat capacity, as required by 40 CFR 60.40c.

e. The affected fuel combustion emission units are not subject to 40 CFR Part 63 Subpart DDDDD, because all such units are (by definition established in 40 CFR 63.7575) existing small gaseous fuel boilers and heaters and, therefore, are not subject to any requirements of Subpart DDDDD, pursuant to 40 CFR 63.7506(c)(3).

f. This permit is issued based on the affected fuel combustion emission unit not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because such unit does not use an air pollution control device for controlling regulated air pollutants.

7.1.5 Control Requirements and Work Practices

Control requirements are not set for the affected fuel combustion emission units. However, there may be requirements for source-wide control requirements set forth in Condition 5.5.

7.1.6 Production and Emission Limitations

Production and emission limitations are not set for the affected fuel combustion emission units. However, there are general source-wide production and emission limitations set forth in Condition 5.6.

7.1.7 Testing Requirements

Testing requirements are not set for the affected fuel combustion emission units. However, there are may be provisions for source-wide testing requirements set forth in Condition 5.7 and general testing requirements set forth in Condition 8.5.

7.1.8 Monitoring Requirements

Monitoring requirements are not set for the affected fuel combustion emission units. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.1.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected fuel combustion emission units to demonstrate compliance with Condition 5.6.1 pursuant to Section 39.5(7)(b) of the Act:

a. Total natural gas usage, in terms of scf/month and scf/year.

b. Emissions of regulated air pollutants calculated based on the compliance procedure from Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected fuel combustion emission units as follows within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected fuel combustion emission units. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.1.12 Compliance Procedures

Compliance with the emission limits established in Condition 5.6 of this permit shall be based on the recordkeeping requirements in Condition 7.1.9 and the emission factors and formulas listed below:

Emissions of NO_x, PM, and VOM from affected fuel combustion emission units shall be calculated based on the standard emission factors for natural gas combustion from AP-42:

Pollutant	Natural Gas Emission Factors ($lb/10^6 ft^3$)
PM	7.6
NO_x	100
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March, 1998.

Emissions (lb) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor.

7.2 Grit Seal Lines

7.2.1 Description

Grit Seal Lines #1 and #2 are comprised of two presses each controlled by a cyclone. Steel straps of different widths are purchased with an adhesive coating applied to one side. The steel strap is passed through an electric heater to melt the adhesive. After a crimping operation, aluminum oxide grit is applied to the adhesive side of the strap to form the final product.

7.2.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit(s)	Description	Date of Construction	Emission Control Equipment
GS-1, GS-2	Grit Seal Line #1	Prior 4/1972	Cyclone C-1
	Grit Seal Line #2	Prior 4/1972	Cyclone C-1

7.2.3 Applicable Provisions and Regulations

a. An "affected grit seal line" for the purpose of these unit specific conditions is a line described in Conditions 7.2.1 and 7.2.2 above.

b. Each affected grit seal line is subject to the emission limits identified in Condition 5.3.2.

c. The affected grit seal line is subject to 35 IAC 212.322(b)(1), which provides that:

   No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

7.2.4 Non-Applicability of Regulations of Concern

The affected grit seal line not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected grit seal line does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.2.5 Control Requirements and Work Practices

The Permittee shall follow good operating practices for the cyclone, including periodic inspection, routine maintenance and repair of defects.

7.2.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected grit seal line is subject to the following:

a. The aluminum oxide grit applied to the steel substrate on Grit Seal Lines #1 and 2 shall not exceed 100 lb/hr, combined.

b. Emissions of particulate matter from Grit Seal Lines #1 and 2 shall not exceed 11 tons/yr. This limit is based on continuous operation of the two lines.

c. The above limitations were established in Permit 88020079, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

d. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total) [T1].

7.2.7 Testing Requirements

a. Pursuant to 35 IAC 212.108 and Section 39.5(7)(b) of the Act, testing for PM_{10} emissions shall be performed as follows:

    i. Pursuant to 35 IAC 212.108(a), emissions of PM_{10} shall be measured by any of the following methods at the option of the owner or operator of an emission unit.

        A. Method 201, 40 CFR part 51, Appendix M [35 IAC 212.108(a)(1)];

        B. Method 201A, 40 CFR part 51, Appendix M [35 IAC 212.108(a)(2)]; or

        C. Method 5, 40 CFR part 60, Appendix A, provided that all particulate matter measured by Method 5 shall be considered to be PM_{10} [35 IAC 212.108(a)(3)].

ii. Emissions of condensable PM_{10} shall be measured by Method 202, 40 CFR part 51, Appendix M [35 IAC 212.108(b)].

iii. The volumetric flow rate and gas velocity for stack test methods shall be determined in accordance with Methods 1, 1A, 2, 2A, 2C, 2D, 3, or 4, 40 CFR part 60, Appendix A [35 IAC 212.108(c)].

iv. Upon a written notification by the Illinois EPA, the owner or operator of a PM_{10} emission unit subject to Condition 7.3.7 (see also 35 IAC 212.108) shall conduct the applicable testing for PM_{10} emissions, condensable PM_{10} emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA [35 IAC 212.108].

b. Pursuant to 35 IAC 212.110 and Section 39.5(7)(b) of the Act, testing for PM emissions shall be performed as follows:

i. Measurement of particulate matter emissions from stationary emission units subject to 35 IAC Part 212 shall be conducted in accordance with 40 CFR part 60, Appendix A, Methods 5, 5A, 5D, or 5E [35 IAC 212.110(a)].

ii. The volumetric flow rate and gas velocity shall be determined in accordance with 40 CFR part 60, Appendix A, Methods 1, 1A, 2, 2A, 2C, 2D, 3, and 4 [35 IAC 212.110(b)].

iii. Upon a written notification by the Illinois EPA, the owner or operator of a particulate matter emission unit subject to 35 IAC Part 212 shall conduct the applicable testing for particulate matter emissions, opacity, or visible emissions at such person's own expense, to demonstrate compliance. Such test results shall be submitted to the Illinois EPA within thirty (30) days after conducting the test unless an alternative time for submittal is agreed to by the Illinois EPA [35 IAC 212.110(c)].

7.2.8 Monitoring Requirements

Monitoring requirements are not set for the affected grit seal line. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.2.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected grit seal line to demonstrate compliance with Conditions 5.6, 5.3.2, 7.2.3, and 7.2.6 pursuant to Section 39.5(7)(b) of the Act:

a. Pursuant to 35 IAC 212.108(f), 212.110(e) and Section 39.5(7)(e) of the Act, the owner or operator of an emission unit subject 35 IAC Part 212 shall retain records of all tests which are performed. These records shall be retained for at least five (5) years after the date a test is performed and shall include the following:

   i. The date, place and time of sampling or measurements;

   ii. The date(s) analyses were performed;

   iii. The company or entity that performed the analyses;

   iv. The analytical techniques or methods used;

   v. The results of such analyses; and

   vi. The operating conditions as existing at the time of sampling or measurement.

b. Records addressing use of good operating practices for the cyclone:

   i. Records for periodic inspection of the cyclones with date, individual performing the inspection, and nature of inspection; and

   ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

c. The amount of grit used, tons/mo and tons/yr.

d. Records of emissions calculated in accordance with Compliance Procedures of Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the grid seal lines with the permit requirements, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. The Illinois EPA shall be notified when:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected grid seal lines. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.2.12 Compliance Procedures

To determine compliance with Conditions 5.6.1 and 7.2.6, emissions of PM from the affected grid seal lines shall be calculated based on the following:

To determine emissions from the affected grid seal lines shall be calculated based on the following emission factors:

Pollutant	Emission Factor (lb/Ton)
PM	15

This is the emission factor for Abrasive Manufacturing Rotary Dryer, Sand Blasting Grit, with Fabric Filter (SCC 30503505), Table 11.31-1, AP-42, Volume I, Fifth Edition, January, 1995. PM emission factor has been corrected to not include the 99.9% control efficiency for a baghouse.

Seal Line Emissions (lb) = (Grit Used, Ton) x (The Appropriate Emission Factor, lb/Ton) x [1 - (Cyclone Efficiency* (%)/100)]

* As specified by manufacturer or vendor of the cyclones

7.3 Iron Phosphate Cleaning Tanks

7.3.1 Description

At the Apex Strapping Line, slit steel is cleaned as it passes through the iron phosphate cleaning tank. The tank is heated with a natural gas-fired burner. At the Pilot Line, slit steel is cleaned as it passes through the cleaning tank. The Pilot Line Cleaning Tank is an experimental cleaning operation located in the Special Products Building.

7.3.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit(s)	Description	Date of Construction	Emission Control Equipment
A-1, PL-1	Iron Phosphate Cleaning Tank (Apex Strapping Line)	8/1995	None
	Pilot Line Iron Phosphate Cleaning Tank (R&D Strapping Line)	9/2001	None

7.3.3 Applicable Provisions and Regulations

a. An "affected phosphate cleaning tank" for the purpose of these unit specific conditions is a unit described in Conditions 7.3.1 and 7.3.2 above.

b. Each affected phosphate cleaning tank is subject to the emission limits identified in Condition 5.3.2.

c. The affected phosphate cleaning tank is subject to 35 IAC 212.321(b)(1), which provides that:

   No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

e. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.3.4 Non-Applicability of Regulations of Concern

The affected phosphate cleaning tank not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected solvent storage tank does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.3.5 Control Requirements and Work Practices

Control requirements are not set for the affected phosphate cleaning tank. However, there may be requirements for source-wide control requirements set forth in Condition 5.5.

7.3.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected phosphate cleaning tanks are subject to the following:

a. Emissions and operation of the phosphate cleaning tank A-1 shall not exceed the following limits:

Material Usage (lb/hr)	Maximum Firing Rate (mmBtu/hr)	Volatile Organic Material Content (% by wt.)
9.42	1.75	4

	E M I S S I O N S				
Nitrogen Oxides		Carbon Monoxide		Volatile Organic Material	
(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
0.18	0.79	0.15	0.66	0.39	1.71

These limits are based on the maximum material usage, the maximum firing rate, standard emission factors, and 8,760 operating hours per year.

The above limitations contain revisions to previously issued Permit 95040106. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21,

Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hourly and annual emissions along with hours of operation have been slightly increased [T1R].

Compliance with annual limits shall be determined from a running total of 12 months of data [T1].

b. Emissions and operation of the phosphate cleaning tank PL-1 shall not exceed the following limits:

i. The affected phosphate cleaning tank shall not use more than 0.07 tons VOM/month and 0.69 tons VOM/year

ii. Emissions from the affected phosphate cleaning tank shall not exceed the following limits:

	Emissions	
Pollutant	(Ton/Mo)	(Ton/Yr)
CO	0.06	0.64
NO_x	0.07	0.77
PM	0.05	0.50
VOM	0.07	0.69

iii. The above limitations were established in Permit 01080036, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

Compliance with annual limits shall be determined from a running total of 12 months of data [T1].

7.3.7 Testing Requirements

Testing requirements are not set for the affected phosphate cleaning tank. However, there are may be provisions for source-wide testing requirements set forth in Condition 5.7 and general testing requirements set forth in Condition 8.5.

7.3.8 Monitoring Requirements

Monitoring requirements are not set for the affected phosphate cleaning tank. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.3.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the phosphate cleaning tank to demonstrate compliance with Conditions 5.6 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

a. Total and individual VOM content (wt.%) in the cleaning materials for A-1 and PL-1;

b. Natural gas usage, Mft^3/mo and Mft^3/yr;

c. The aggregate monthly and annual VOM emissions from the affected cleaning tank based on the cleaning material usage and the amount of VOM in the cleaning material, with supporting calculations; and

d. The aggregate monthly and annual CO, NO_x, PM, and VOM emissions from the affected cleaning tank shall be maintained, based on fuel usage and the applicable emission factors, with supporting calculations.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected phosphate cleaning tank as follows within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected solvent storage tank. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.3.12 Compliance Procedures

To determine compliance with Conditions 5.6.1 and 7.3.6, emissions the affected phosphate cleaning tank shall be calculated based on the following equation and emission factors:

a. VOM emissions from cleaning operations:

VOM (lb) = (Cleaning Material Usage, lb) x (VOM Content of Cleaning Material, % by Wt)

b. Emissions from the natural gas combustion:

Emissions (lb) = natural gas consumed multiplied by the appropriate emission factor.

Pollutant	Natural Gas Emission Factors ($lb/10^6$ ft^3)
PM	7.6
NO_x	100
CO	84

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Tables 1.4-1 and 1.4-2, Volume I, March, 1998.

7.4 Strapping Lines (Contact and Quench Pots)

7.4.1 Description

At all Magnus lines, the slit steel is cleaned and heat treated as it passes through two lead pots in series. The first pot is the Contact Pot and the second pot is the Quench Pot. The pots are heated via natural gas combustion.

7.4.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
M2-1	Magnus 2 Strapping Line Contact Pot	Prior to 4/14/72	None
M2-2	Magnus 2 Strapping Line Quench Pot	Prior to 4/14/72	None
M3-1	Magnus 3 Strapping Line Contact Pot	Prior to 4/14/72	None
M3-2	Magnus 3 Strapping Line Quench Pot	Prior to 4/14/72	None
M4-1	Magnus 4 Strapping Line Contact Pot	2/2000	Smog-Hog SH-1
M4-2	Magnus 4 Strapping Line Quench Pot	2/2000	Smog-Hog SH-1

7.4.3 Applicable Provisions and Regulations

a. An "affected strapping line" for the purpose of these unit specific conditions is an emission unit as described in Conditions 7.4.1 and 7.4.2 above.

b. Each affected strapping line is subject to the emission limits identified in Condition 5.3.2.

c. i. The affected strapping line M4 is subject to 35 IAC 212.321(b)(1), which provides that:

> No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

ii. The affected strapping lines M2 and M3 are subject to 35 IAC 212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

d. No person shall cause or allow the emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm, [35 IAC 214.301].

e. No person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.4.4 Non-Applicability of Regulations of Concern

a. The affected strapping lines are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because affected strapping line are not by definition fuel combustion emission units.

b. The affected strapping lines are not subject 35 IAC 217.141, emissions of nitrogen oxides from existing fuel combustion emission sources in major metropolitan areas, because the affected strapping line are not by definition fuel combustion emission units.

c. This permit is issued based on the each affected strapping line operated at the source not being subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because either 1) each line does not use a control device or 2) for line M4 does not have pre-control PM_{10} emissions exceeding major source threshold.

7.4.5 Control Requirements and Work Practices

a. The affected strapping lines shall be operated without the use of quenching oils.

b. The Permittee shall follow good operating practices for the control device(s) on line M4, including periodic inspection, routine maintenance and repair of defects.

7.4.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected strapping line M4 (M4-1 and M4-2) is subject to the following:

a. Emissions and production shall not exceed the following limits:

i. Production Rate and Natural Gas Usage/Firing Rates:

Item of Equipment	Process Rate (lb/hr)	Firing Rate (mmBtu/hr)
Contact Pot M4-1	13,235.8	4.64
Quench Pot M4-2	13,235.8	5.22

ii. Emissions of Particulate Matter (PM) and Hazardous Air Pollutants (HAP) from Steel Strap Production:

	PM		HAP (e.g., Lead)	
Item of Equipment	(lb/hr)	(Ton/yr)	(lb/hr)	(Ton/yr)
Contact Pot M4-1	1.32	5.80	0.57	2.49
Quench Pot M4-2	1.32	5.80	0.44	1.91
Totals		11.60		4.40

These limits are based on representations of the maximum actual emissions determined from the maximum hourly production rate, the maximum hours of operation (8,760 hours/year), and standard emission factors for particulate matter. HAP emissions are based on lead comprising 43% by weight of the particulate matter emissions from the contact pot and 33% by weight of the particulate matter emissions from the quench pots.

iii. Emissions of Carbon Monoxide (CO), Nitrogen Oxides (NO_x), Particulate Matter (PM), Sulfur Dioxide (SO_2), and Volatile Organic Material (VOM) from combustion of natural gas:

A. Hourly Emissions:

Item of Equipment	CO (lb/hr)	NO_x (lb/hr)	PM (lb/hr)	SO_2 (lb/hr)	VOM (lb/hr)
Contact Pot M4-1	0.39	0.46	0.04	0.01	0.03
Quench Pot M4-2	0.44	0.52	0.04	0.01	0.03

B. Annual Emissions:

Item of Equipment	CO (T/yr)	NO_x (T/yr)	PM (T/yr)	SO_2 (T/yr)	VOM (T/yr)
Contact Pot M4-1	1.70	2.03	0.15	0.01	0.11
Quench Pot M4-2	1.92	2.29	0.17	0.01	0.13
Totals	3.62	4.32	0.32	0.02	0.24

C. These limits are based on standard emission factors, the type of fuel(s), the maximum firing rate(s), and the maximum hours of operation (8,760 hours/year).

b. The above limitations were established in Permit 99030098, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

c. Compliance with annual limits shall be determined based on the 12 months rolling period of data.

7.4.7 Testing Requirements

Testing requirements are not set for the affected strapping lines However, there are may be provisions for source-wide testing requirements set forth in Condition 5.7 and general testing requirements set forth in Condition 8.5.

7.4.8 Monitoring Requirements

Monitoring requirements are not set for the affected stripping line. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.4.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected strapping lines to demonstrate compliance with Condition 5.6 and Condition 7.4.6, pursuant to Section 39.5(7)(b) of the Act:

a. The amount of steel strapping processed in the strapping lines, tons/mo and tons/yr.

b. The aggregate monthly and annual PM and HAP emissions from the affected pots based on the operating schedule, the weight of steel straps processed and the applicable emission factors, with supporting calculations.

c. Natural gas fuel usage for each affected pot, ft^3/mo and ft^3/yr.

d. Monthly and annual aggregate emissions of regulated air pollutants from the affected pots shall be maintained, based on fuel consumption and the applicable emission factors from Condition 7.4.12, with supporting calculations.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected strapping line as follows within 30 days, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected strapping line. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.4.12 Compliance Procedures

Compliance with the emission limits established in Conditions 5.6 and 7.4.6 of this permit shall be based on the recordkeeping requirements in Condition 7.4.9 and the following emission factors:

a. PM_{10} and lead emissions from the affected strapping lines shall be calculated based on the following emission factors derived from the most recent stack test:

Pollutant	Emission Factor (lb/ton)
PM_{10}	0.510
Lead	0.0067

Emissions (lb) = (Wt. of Metal Charged to Pot, Ton) x (The Appropriate Emission Factor, lb/Ton)

b. Natural gas combustion emissions from the affected pots shall be calculated based on the following emission factors:

Pollutant	Emission Factor (lb/Mft^3)
CO	84
NO_x	100
PM	7.6
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (< 100 mmBtu/hr), Table 1.4-2, AP-42, Volume 1, Fifth Edition, Supplement D March, 1998.

Natural Gas Combustion Emissions (lb) = (Natural Gas Consumed, Mft^3) x (The Appropriate Emission Factor, lb/Mft^3)

7.5 Strapping Coating Lines and Wax Applicators

7.5.1 Description

The strap is painted at the dip tanks (A-2, M2-3, M3-3, and M4-3) and dried at the ovens (A-3, M2-4, M3-4, and M4-4). Finally, wax is applied and dried at A-4, M2-5, M3-5 and M4-5. Wax is also applied and dried at R-1, PRINT-1 and SLIT=2.

7.5.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
A-2	Paint Applicator (Apex Strapping Line)	Prior to 4/14/72	None
A-3	Electric Paint Drying Oven (Apex Strapping Line)	2/1985	None
A-4	Wax Applicator/Electric Dryer (Apex Strapping Line)	Prior to 4/14/72	None
M2-3	Paint Dip Tank (Magnus 2 Strapping Line)	Prior to 4/14/72	None
M2-4	Natural Gas-Fired Paint Drying Oven (Magnus 2 Strapping Line)	Prior to 4/14/72	None
M2-5	Wax Applicator/Electric Dryer (Magnus 2 Strapping Line)	Prior to 4/14/72	None
M3-3	Paint Dip Tank (Magnus 3 Strapping Line)	Prior to 4/14/72	None
M3-4	Natural Gas-Fired Paint Drying Oven (Magnus 3 Strapping Line)	Prior to 4/14/72	None
M3-5	Wax Applicator/Electric Dryer (Magnus 3 Strapping Line)	Prior to 4/14/72	None
M4-3	Paint Dip Tank (Magnus 4 Strapping Line)	2/2000	None
M4-4	Electric Paint Drying Oven (Magnus 4 Strapping Line)	2/2000	Thermal Oxidizer

Emission Unit	Description	Date Constructed	Emission Control Equipment
M4-5	Wax Applicator/Electric Dryer (Magnus 4 Strapping Line)	2/2000	None
R-1	Wax Applicator/Electric Dryer (1,000# Rewinder)	07/2001	None
PRINT-1	Wax Applicator/Electric Dryer (Print Line)	06/2001	None
SLIT-2	Wax Applicator/Electric Dryer (#2 Slitting Line)	02/2003	None

7.5.3 Applicable Provisions and Regulations

a. An "affected coating line" for the purpose of these unit specific conditions is coating operations described in Conditions 7.5.1 and 7.5.2 above.

b. Each affected coating line is subject to the emission limits identified in Condition 5.3.2.

c. No owner or operator of a coating line shall apply at any time any coating in which the VOM content exceeds the emission limitations for Coil Coating. The following emission limitation is expressed in units of VOM per volume of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied at each coating applicator. Compounds which are specifically exempted from the definition of VOM should be treated as water for the purpose of calculating the "less water" part of the coating composition [35 IAC 218.204(d)]:

kg/l	lb/gal
0.20	1.7

d. For coil coating operations, where VOM content in applied coatings exceeds the limit of Condition 7.5.3(c) above, any owner or operator shall comply with 218.207(a) and (b), if a capture system and control device are operated at all times and achieve 81 percent overall reduction of the VOM from coating line and the control device has a 90 percent efficiency.

e. The affected coating lines constructed or modified after January 5, 1981 (Lines M4, R-1, PRINT-1, SLIT2) are subject to emission limitations and requirements of 40 CFR 60

Subpart TT: Standards of Performance for Metal Coil Surface Coating. Pursuant to 40 CFR 60.462(a), on and after the date on which 40 CFR 60.8 requires a performance test to be completed, each owner or operator subject to 40 CFR 60 Subpart TT shall not cause to be discharged into the atmosphere more than the following limits. In addition, after such date, the owner or operator shall not rely on the control device to demonstrate compliance with 40 CFR 60.462(a) until the performance testing required by Condition 2.2.7(b) is performed.

i. 0.28 kilogram VOC per liter (kg VOC/l) of coating solids applied for each calendar month for each affected facility that does not use an emission control device(s) [40 CFR 60.462(a)(1)]; or

ii. 0.14 kg VOC/l of coating solids applied for each calendar month for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency [40 CFR 60.462(a)(2)]; or

iii. 10 percent of the VOCs applied for each calendar month (90 percent emission reduction) for each affected facility that continuously uses an emission control device(s) operated at the most recently demonstrated overall efficiency [40 CFR 60.462(a)(3)]; or

iv. A value between 0.14 (or a 90-percent emission reduction) and 0.28 kg VOC/l of coating solids applied for each calendar month for each affected facility that intermittently uses an emission control device operated at the most recently demonstrated overall efficiency [40 CFR 60.462(a)(4)].

f. Coil coating operations performed at the source are subject to the HAP emission limitations established in 40 CFR 63 Subpart SSSS National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil. HAP emissions from each coil coating operation performed at this source shall not exceed one of the following limits, pursuant to 40 CFR 63.5120(a):

i. No more than 2 percent of the organic HAP applied for each month during each 12-month compliance period (98 % reduction); or

ii. No more than 0.046 kilogram (kg) of organic HAP per liter of solids applied during each 12-month compliance period; or

iii. If an oxidizer is in use to control organic HAP emissions, an outlet organic HAP concentration shall be no greater than 20 parts per million by volume (ppmv) on a dry basis and the efficiency of the capture system is 100 percent.

7.5.4 Non-Applicability of Regulations of Concern

a. The affected coating lines (with exception of Lines M4, R-1, PRINT-1, SLIT2) are not subject to the NSPS for Metal Coil Surface Coating, 40 CFR 60 Subpart TT because construction, modification, or reconstruction of the affected coating lines were commenced prior to January 5, 1981.

b. The natural gas-fired drying ovens on the affected coating lines are not subject to 35 IAC 216.121, emissions of carbon monoxide from fuel combustion emission units, because the affected coating lines are not by definition fuel combustion emission units.

c. No owner or operator of a coating line subject to the limitations of 35 IAC 218.204 is required to meet the limitations of 35 IAC 218.301 or 218.302, Use of Organic Material, after the date by which the coating line is required to meet 35 IAC 218.204 [35 IAC 218.209].

d. The affected coating lines are not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected coating lines do not use an add-on control device to achieve compliance with an emission limitation or standard; or (Dryer M4-4) is subject to a NESHAP proposed after November 15, 1990, pursuant to 40 CFR 64.2(b)(1)(i).

7.5.5 Control Requirements and Work Practices

a. The Permittee may idle the operation of the thermal oxidizer on the coating line M4 any time, if compliance with all of the following is demonstrated:

i. VOM content in applied coatings not exceeds the limits established in Conditions 7.5.3(c) and 7.5.3(e);

ii. HAP emission limit established in Condition 7.5.3(f)(ii) is not exceeded; and

iii. Annual VOM emissions from coating line M4 do not exceed the limits established in Condition 7.5.6 and Construction Permit 99030098.

b. If the Permittee decides to put the thermal oxidizer back to service, then the afterburner combustion chamber shall be preheated to at least the manufacturer's recommended temperature but no less than the temperature at which compliance was demonstrated in the most recent compliance test, or 1400°F in the absence of a compliance test. This temperature shall be maintained during operation of the affected coating line.

7.5.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected coating line M4 (M4-3, M4-4. and M4-5) is subject to the following:

Total emissions of VOM and HAP shall not exceed the following limits:

	VOM		Total HAP	
Material	(Ton/mo)	(Ton/yr)	(Ton/mo)	(Ton/yr)
Coating (Wax & Paint Combined)	1.97	11.80	1.39	8.33

These limits are based on representations of the maximum actual emissions based on the maximum material usage, the maximum VOM and HAP contents of these materials, and the minimum overall control efficiency of the afterburner. (Note: The VOM and HAP content limitation includes water and exempt compounds.)

The above limitations contain revisions to previously issued Permit 99030098. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of this aforementioned permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203. These limits continue to ensure that the construction and/or modification addressed in this permit does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, emissions from paint and wax operations have been combined. [T1R].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.5.7 Testing Requirements

a. HAP organic content (40 CFR 63.5160(b)):

To determine the organic HAP weight fraction of each coating material applied, one of the following procedures shall be used:

i. Method 311 The Method 311 determination may be performed by the manufacturer of the material. The organic HAP content must be calculated according to the criteria and procedures in 63.5160(b)(1)(i) through (iii).

ii. Method 24 To determine the total volatile matter content as weight fraction of nonaqueous volatile matter and use it as a substitute for organic HAP, using Method 24 of 30 CFR Part 60, Appendix A. The Method 24 determination may be performed by the manufacturer of the coating.

b. Solids content (40 CFR 63.5160(c):

The source must determine the solids content of each coating material applied. The source may determine the volume solids content using ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 (incorporated by reference, see 40 CFR 63.14), or an EPA approved alternative method. The ASTM D2697-86 (Reapproved 1998) or ASTM D6093-97 determination may be performed by the manufacturer of the material and the results provided to the source. Alternatively, the source may rely on formulation data provided by material providers to determine the volume solids.

c. The VOM content of specific coatings and cleaning solvents used on the affected coating line shall be determined as follows:

i. The VOM content of representative coatings “as applied” on the affected coating line shall be determined according to USEPA Reference Methods 24 and 24A of 40 CFR 60 Appendix A and the procedures of 35 Ill. Adm. Code 218.105(a).

ii. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records directly reflect the application of such material and separately account for any additions of solvent.

iii. Such testing shall be performed anytime when a new coating being introduced to the affected coating line. For existing coatings, the Permittee shall

annually confirm VOM content from the previous test and records of these verifications shall be kept on site for any inspection review.

d. If the source decides to reestablish thermal oxidizer in service, then see the following requirements as guidance for conducting stack tests:

i. 40 CFR 63.5160(d) and 63.5160(e)

ii. 40 CFR 60.466(a)(2) through (a)(6)

7.5.8 Monitoring Requirements

a. If the thermal oxidizer is back to operation on Line M4, then the following monitoring procedures shall be applied:

i. Requirements of 40 CFR Part 63 Subpart SSSS

To demonstrate continuing compliance with the standards established in Subpart SSSS, the source must monitor and inspect each capture system and each control device required to comply with 40 CFR 63.5120 following the date on which the initial performance test of the capture system and control device is completed. The source must install and operate the monitoring equipment as specified in 40 CFR 63.5150(a)(1) through (a)(4).

ii. Requirements of 40 CFR Part 60 Subpart TT

A. Where compliance with the limit specified in 40 CFR 60.462(a)(4) is achieved through the intermittent use of emission control devices, the owner or operator shall compute and record for each affected facility the average VOC content of coatings applied during each calendar month according to the equations provided in 40 CFR 60.463 [40 CFR 60.464(b)].

B. If thermal incineration is used, each owner or operator subject to the provisions of this subpart shall install, calibrate, operate, and maintain a device that continuously records the combustion temperature of any effluent gases incinerated to achieve compliance with 40 CFR 60.462(a)(2), (3), or (4) and conditions of this permit. This device shall have an accuracy of 2.5°C. or ±0.75 percent of the temperature being measured expressed in degrees Celsius, which is greater. Each owner or operator shall also record all periods (during actual coating operations) in excess of 3 hours during which the average temperature in any

thermal incinerator used to control emissions from an affected facility remains more than 28□C (50°F) below the temperature at which compliance with 40 CFR 60.462(a)(2), (3), or (4)) was demonstrated during the most recent measurement of incinerator efficiency required by 40 CFR 60.8. The records required by 40 CFR 60.7 shall identify each such occurrence and its duration [40 CFR 60.464(c)].

iii. Requirements of 35 IAC Part 218

An owner or operator that uses an afterburner to comply with any Section of 35 Ill. Adm. Code Part 218 shall use Illinois EPA and USEPA approved continuous monitoring equipment which is installed, calibrated, maintained, and operated according to vendor specifications at all times the afterburner is in use. The continuous monitoring equipment must monitor for each afterburner which does not have a catalyst bed, the combustion chamber temperature of each afterburner [35 Ill. Adm. Code 218.105(d)(2)(A)(i)].

b. Monitoring requirements for VOM/HAP content in coatings shall be achieved by keeping appropriate records as explained further in Condition 7.5.9.

7.5.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected coating lines to demonstrate compliance with Conditions 5.6, 7.5.3, and 7.5.6, pursuant to Section 39.5(7)(b) of the Act:

a. Each owner or operator subject to the provisions of 40 CFR 60 Subpart TT shall maintain at the source records of all data and calculations used to determine monthly VOC emissions from each affected facility and to determine the monthly emission limit, where applicable. These records shall identify the compliance option relied upon to show compliance with the NSPS each month. Where compliance is achieved through the use of thermal incineration, each owner or operator shall maintain, at the source, daily records of the incinerator combustion temperature [40 CFR 60.465(e)].

b. The following records, as required by 40 CFR 63.5190, for demonstration of compliance with Subpart SSSS:

i. Records of the coating lines on which the source used each compliance option and the time periods (beginning and ending dates and times) the source used each option.

ii. Records specified in 40 CFR 63.10(b)(2) of all measurements needed to demonstrate compliance with this subpart, including:

A. Continuous emission monitor data in accordance with 40 CFR 63.5150(a)(2):

B. Control device and capture system operating parameter data in accordance with 40 CFR 63.5150(a)(1), (3), and (4).

C. Organic HAP content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(b).

D. Volatile matter and solids content data for the purpose of demonstrating compliance in accordance with 40 CFR 63.5160(c).

E. Overall control efficiency determination or alternative outlet HAP concentration using capture efficiency tests and control device destruction efficiency test in accordance with 40 CFR 63.5160(d), (e), and (f).

F. Material usage, HAP usage, volatile matter usage, and solids usage and compliance demonstrations using these data in accordance with 40 CFR 63.5170(a), (b), and (d).

c. Pursuant to 35 IAC 218.211(c)(2), the Permittee shall collect and record all of the following information each day for the affected coating line and maintain the information at the source for a period of three years:

i. The name and identification number of each coating as applied on each affected coating line; and

ii. The weight of VOM per volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on each affected coating line.

d. Pursuant to 35 IAC 218.211(e)(2), the owner or operator of a subject coating line shall collect and record all of the following information each day for each coating line and maintain the information at the source for a period of three years:

i. Control device monitoring data;

ii. A log of operating time for the capture system, control device, monitoring equipment and the associated emission source; and

iii. A maintenance log for the capture system, control device and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

e. Records addressing use of good operating practices for the afterburner:

i. Records for periodic inspection of the afterburner with date, individual performing the inspection, and nature of inspection; and

ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

f. Records of the coating usage for the affected coating line, gal/mo and gal/yr.

g. The VOM content of coatings, % by wt.

h. The HAP content of coatings, % by wt.

i. Density of coatings, lb/gal.

j. The solvent usage for the affected coating line, gal/mo and gal/yr.

k. Density of solvent, lb/gal.

l. The monthly and aggregate annual VOM and HAP emissions from all affected coating lines and separately for coating line M4 as identified in Condition 7.5.6, based on the compliance procedure of Condition 7.5.12.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected coating lines with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

a. The following reports are required pursuant 40 CFR 63.5180:

i. Notification of Performance Test as specified in 40 CFR 63.7 and 63.9(e) if the source complying with the emission standard using a control device.

ii. Notification of Compliance Status as specified in 40 CFR 63.9(h). The Notification of Compliance Status shall be submitted no later than 30 calendar days following the end of the initial 12-month compliance period described in 40 CFR 63.5130.

iii. The source shall submit performance test report as specified in 40 CFR 63.10(d)(2) if a control device is used to comply with the emission standards.

iv. The source shall submit start-up, shutdown, and malfunction reports as specified in 40 CFR 63.10(d)(5) if a control device is used to comply with Subpart SSSS.

v. The source shall submit semi-annual compliance reports containing the following information specified in 40 CFR 63.5180(g)(1) and (g)(2):

A. Compliance report dates

1. The first semiannual reporting period begins 1 day after the end of the initial compliance period described in 40 CFR 63.5130(d) that applies to your affected source and ends 6 months later.

2. The first semiannual compliance report must cover the first semiannual reporting period and be postmarked or delivered no later than 30 days after the reporting period ends.

3. Each subsequent compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31.

4. Each subsequent compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period.

5. For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or Part 71, and the permitting authority has established dates for submitting semiannual reports

pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the source may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the dates in 40 CFR 63.5180(g)(1)(i) through (iv).

B. The semi-annual compliance report must contain the information as established in 40 CFR 63.5180(g)(2).

vi. For each deviation occurring at an affected source, the Permittee shall submit the semi-annual compliance report containing the information in 40 CFR 63.5180(g)(2)(i) through (iv) and the information in 40 CFR 63.5180(h)(1) through (3).

b. The following reports are required pursuant 40 CFR 60.465:

i. Where compliance with the numerical limit specified in Condition 7.5.3 (see also 40 CFR 60.462(a) (1), (2), or (4)) is achieved through the use of low VOC-content coatings without emission control devices or through the use of higher VOC-content coatings in conjunction with emission control devices, each owner or operator subject to the provisions of this subpart shall include in the initial compliance report required by 40 CFR 60.8 the weighted average of the VOC content of coatings used during a period of one calendar month for each affected facility. Where compliance with Condition 7.5.3 (see also 40 CFR 60.462(a)(4)) is achieved through the intermittent use of a control device, reports shall include separate values of the weighted average VOC content of coatings used with and without the control device in operation [40 CFR 60.465(a)].

ii. Pursuant to 40 CFR 60.465(b), where compliance with Condition 7.5.3 (see also 40 CFR 60.462(a)(2), (3), or (4)) is achieved through the use of an emission control device that destroys VOCs, each owner or operator subject to the provisions of this subpart shall include the following data in the initial compliance report required by 40 CFR 60.8:

A. The overall VOC destruction rate used to attain compliance with Special Condition No. 2.2.3(b)(ii), (iii), or (iv) (see also 40 CFR 60.462(a)(2), (3), or (4)) and the calculated emission limit used to attain compliance with Special Condition No. 2.2.3(b)(iv) (see also 40 CFR 60.462(a)(4)) [40 CFR 60.465(b)(1)]; and

B. The combustion temperature of the thermal incinerator or the gas temperature, both upstream and downstream of the incinerator catalyst bed, used to attain compliance with Special Condition No. 2.2.3(b)(ii), (iii), or (iv) (see also 40 CFR 60.462(a)(2), (3), or (4)) [40 CFR 60.465(b)(2)].

iii. Following the initial performance test, the owner or operator of an affected facility shall identify, record, and submit a written report to the Illinois EPA and or USEPA every calendar quarter of each instance in which the volume-weighted average of the local mass of VOCs emitted to the atmosphere per volume of applied coating solids (N) is greater than the limit specified under Condition 7.5.3 (see also 40 CFR 60.462). If no such instances have occurred during a particular quarter, a report stating this shall be submitted to the Illinois EPA and or USEPA semiannually [40 CFR 60.465(c)].

iv. The owner or operator of each affected facility shall also submit reports at the frequency specified in 40 CFR 60.7(c) when the incinerator temperature drops as defined under Condition 7.5.8 (see also 40 60.464(c)). If no such periods occur, the owner or operator shall state this in the report [40 CFR 60.465(d)].

c. The owner or operator of the affected coating line shall notify the Illinois EPA of any record showing violation of Condition 7.5.3 (see also 35 Ill. Adm. Code 218.204) within 30 days following the occurrence of the violation [35 IAC 218.211(c)(3)(A)].

d. The owner or operator of a subject coating line shall notify the Illinois EPA of any record showing violation of Condition 7.5.3 (see also 35 Ill. Adm. Code 218.207) within 30 days following the occurrence of the violation [35 IAC 218.211(e)(3)(A)].

e. Emissions of VOM in excess of the limits in Condition 7.5.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is allowed not to operate the thermal oxidizer if it satisfies to all of the following requirements:

a. Emission limitations in Condition 7.5.6 are met; and

b. Emission limitations of 35 IAC 218.204, 40 CFR 60 Part TT, 40 CFR 63 Subpart SSSS, and all corresponded emission limits in Condition 7.5.3 are met.

7.5.12 Compliance Procedures

a. To determine compliance with Conditions 5.6 and 7.5.6, VOM and organic HAP emissions from the affected coating line shall be calculated based on the following:

i. Controlled Emissions

VOM/HAP (lb) = (Coating/Wax Usage, gal) x (Coating Density, lb/gal) x (VOM/HAP Content of Coating, % by Wt.) x [1 - (Afterburner Efficiency* (%)/100)] + (Cleaning Solvent Usage, gal) x (Solvent Density, lb/gal) x [1 - (Afterburner Efficiency* (%)/100)]

* As specified by manufacturer or vendor of the afterburner or by most recent testing

ii. Uncontrolled Emissions

VOM/HAP (lb) = (Coating/Wax Usage, gal) x (Coating Density, lb/gal) x (VOM/HAP Content of Coating, % by Wt.)

b. Compliance with numerical limitations of 40 CFR Part 63 Subpart SSSS (see also Condition 7.5.3(f)) shall be achieved by appropriate testing procedures described in Conditions 7.5.7(a), (b), and (d)(i), and recordkeeping requirements of Condition 7.5.9.

c. Compliance with VOM content limitations of 40 CFR Part 60 Subpart TT (see also Condition 7.5.3(e)) shall be achieved by using the procedures established in 40 CFR 60.463(c).

d. Compliance of the affected coating line with VOM emission limitations in Condition 7.5.3(c) shall be based on the recordkeeping requirements in Condition 7.5.9 and by the use of the formula listed below:

$$\text{VOM Coating Content} = V \times D/[1 - W \times D],$$

Where:

V = Percent VOM in the coating (%)

D = Overall coating density (lb/gal)

$$W = \Sigma\ (w_i/d_i)$$

Where:

w_i = Percent exempt compound i in the coating,

d_i = Overall density of exempt compound i, lb/gal and the summation Σ is applied over water and all exempt compounds i in the coating.

7.6 Cold Rolling Mill

7.6.1 Description

The Cold Rolling Mill is used to reduce the thickness of the steel coils. Emissions from the cold rolling operation are collected by four exhaust hoods and ducted to Mist Eliminator #1 and #2.

7.6.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
CRM	Wean United Cold Rolling Mill	Prior to 4/14/1972	Mist Eliminators #1 and #2

7.6.3 Applicable Provisions and Regulations

a. An "affected rolling mill" for the purpose of these unit specific conditions is an equipment as described in Conditions 7.6.1 and 7.6.2 above.

b. The affected rolling mill is subject to the emission limits identified in Condition 5.3.2.

c. The affected rolling mill is subject to 35 IAC 212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

7.6.4 Non-Applicability of Regulations of Concern

The affected rolling mill is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected rolling mill does not have potential pre-control device emissions of the applicable regulated air pollutant that equals or exceeds major source threshold levels.

7.6.5 Control Requirements and Work Practices

a. The Permittee shall follow good operating practices for the mist eliminators, including periodic inspection, routine maintenance and prompt repair of defects.

b. This permit is issued based on the roll coolant containing no organic material.

7.6.6 Production and Emission Limitations

Production and emission limitations are not set for the affected rolling mill. However, there are source-wide production and emission limitations set forth in Condition 5.6.

7.6.7 Testing Requirements

Testing requirements are not set for the affected rolling mill. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.6.8 Monitoring Requirements

Monitoring requirements are not set for the affected rolling mill. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.6.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected rolling mill to demonstrate compliance with Conditions 5.6 and 7.6.3, pursuant to Section 39.5(7)(b) of the Act:

a. Records addressing use of good operating practices for the mist eliminators:

   i. Records for periodic inspection of the mist eliminators with date, individual performing the inspection, and nature of inspection; and

   ii. Records for prompt repair of defects, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

b. The amount of steel processed, tons/mo and tons/yr;

c. The amount of roll coolant used, tons/mo and tons/yr;

d. The amount of spent roll coolant recovered, tons/mo and tons/yr; and

e. The aggregate monthly and annual PM emissions calculated based on the Compliance Procedure in Condition 7.6.12.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected rolling mill with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of PM from the affected rolling mill in excess of the limits specified in Condition 7.1.3 within 30 days of such occurrence.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected rolling mill. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.6.12 Compliance Procedures

To determine compliance with Condition 5.6, emissions from the affected rolling mill shall be calculated based on the following:

PM_{10} and VOM emissions from the affected rolling mill shall be calculated based on the following emission factors derived from the most recent stack test:

Pollutant	Emission Factor (lb/ton)
PM_{10}	0.431
VOM	0.044

Emissions (lb) = (Wt. of Steel Strap Processed, Ton) x (The Appropriate Emission Factor, lb/Ton)

7.7 Punch Press Departments

7.7.1 Description

Emissions of volatile organic material (VOM) result from the vanishing oil used to lubricate the steel during punching. Punch Press Department #1 is an existing operation and Punch Press Department #2 is a new operation. The Permittee operates punch presses to produce steel seals used to clamp the end of strapping together.

7.7.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
PPD-1	Punch Press Department #1 (36 Machines)	Prior to 01/01/1994	None
PPD-2	Punch Press Department #2 (10 Machines)	07/01/2001	None

7.7.3 Applicable Provisions and Regulations

a. An "affected punch press department" for the purpose of these unit specific conditions, is a Punch Press Department, which is described in Conditions 7.7.1 and 7.7.2.

b. Each affected punch press department is subject to 35 IAC 218, Subpart G: Use of Organic Material, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of organic material into the atmosphere from any emission unit, except as provided in 35 IAC 218.302 and with the following exception: if no odor nuisance exists the limitation shall apply only to photochemically reactive material.

c. The affected punch press department is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any existing process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.7.4 Non-Applicability of Regulations of Concern

The affected punch press department is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the affected punch press department does not use an add-on control device to achieve compliance with an emission limitation or standard.

7.7.5 Control Requirements and Work Practices

Control requirements are not set for the affected punch press department. However, there may be requirements for source-wide control requirements set forth in Condition 5.5.

7.7.6 Production and Emission Limitations

In addition to Condition 5.3.2 and the source-wide emission limitations in Condition 5.6, the affected punch press departments are subject to the following:

a. Vanishing Oil usage from the affected punch press departments shall not exceed 400 gallons/month and 4,000 gallons/year and 100 gallons/month and 1,000 gallons/year, respectively for Departments 1 and 2. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

b. The VOM content of vanishing oil used in the affected punch press departments shall not exceed 6.34 lbs/gallons.

c. VOM emissions from the affected punch press departments shall not exceed the following limits:

	VOM Emissions	
	(Ton/Mo)	(Ton/Yr)
Department #1	1.28	12.68
Department #2	0.32	3.17

d. The above limitations were established in Permit 01020025, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

e. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.7.7 Testing Requirements

Upon request of the Illinois EPA the VOM content of the vanishing oil used in the affected punch press departments shall be determined using the procedure specified by 35 IAC 218.105(a).

7.7.8 Monitoring Requirements

Monitoring requirements are not set for the affected punch press departments. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.7.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected punch press departments to demonstrate compliance with Conditions 5.6 and 7.7.6, pursuant to Section 39.5(7)(b) of the Act:

a. Vanishing oil usage, separately for PPD-1 and PPD-2 (gal/mo and gal/yr);

b. Material Safety Data Sheet (MSDS) or other manufacture specification for the vanishing oil, that include VOM content and whether the organic material qualifies as photochemically reactive material as defined in 35 IAC 211.4690; and

c. VOM emissions (tons/month and ton/year), with supporting calculation and calculated separately for PPD-1 and PPD-2 in accordance with compliance procedures of Condition 7.7.12.

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected punch press departments with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Emissions of VOM from the affected punch press departments in excess of the limits specified in Condition 7.7.6 within 30 days of such occurrence.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected punch press departments without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for the activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Changes in raw materials (vanishing oil), as long as such changes do not cause a violation of Conditions 7.7.3(b) and 7.7.6.

7.7.12 Compliance Procedures

Compliance with emission limits in Condition 7.7.6 shall be based on the recordkeeping requirements in Condition 7.7.9 and the formula listed below:

VOM emissions = Vanishing oil usage (gal) x VOM content (lbs/gal) x 1 ton/ 2,000 lbs.

7.8 Gasoline Storage Tank

7.8.1 Description

This tank is a two compartment underground storage tank and is used for the storage of diesel fuel and gasoline. The total volume of the tank is 1500 gallons. The diesel fuel compartment is 1,000 gallons and the gasoline compartment is 500 gallons.

7.8.2 List of Emission Units and Air Pollution Control Equipment

Emission Unit	Description	Date Constructed	Emission Control Equipment
UST-1A/1B	Modern Welding Two Compartment 1,500 Gallon Underground Gasoline/Diesel Storage Tank. Equipped with a submerged loading pipe and used for gasoline non-retail dispensing operations.	10/1995	None

7.8.3 Applicable Provisions and Regulations

a. The Two Compartment 1,500 Gallon Underground Gasoline/Diesel Storage Tank is an "affected tank" for the purpose of these unit-specific conditions.

b. No person shall cause or allow the loading of any organic material into any stationary tank having a storage capacity of greater than 946 1 (250 gal), unless such tank is equipped with a permanent submerged loading pipe or an equivalent device approved by the Illinois EPA according to the provisions of 35 IAC 201, and further processed consistent with 35 IAC 218.108 [35 IAC 218.122(b)].

7.8.4 Non-Applicability of Regulations of Concern

a. The affected tank is not subject to the NSPS for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984, 40 CFR 60 Subpart Kb because the capacity is less than 40 cubic meters (m^3).

b. Pursuant to 35 IAC 218.119(e), the limitations of 35 IAC 218.120, Control Requirements for Storage Containers of VOL, do not apply to the affected tank because the capacity is less than 151 m^3 (40,000 gal) and the affected tank is used for storing petroleum liquids.

c. The limitations of 35 IAC 218.121, Storage Containers of VPL, do not apply to the affected tank because the capacity is less than 151 m^3 (40,000 gal).

d. Pursuant to 35 IAC 218.123(a)(2), the limitations of 35 IAC 218.123, Petroleum Liquid Storage Tanks, shall not apply to any stationary storage tank with a capacity of less than 151.42 cubic meters (40,000 gallons).

e. Pursuant to 35 IAC 218.583(b)(3), the limitations of 35 IAC 218.583 shall not apply to transfers of gasoline to a stationary storage tank at a gasoline dispensing operation if the tank has a capacity of less than 575 gallons.

f. Pursuant to 35 IAC 218.586(c), the limitations of 35 IAC 218.586, Gasoline Dispensing Operations - Motor Vehicle Fueling Operations, do not apply to the affected tank because the gasoline dispensing operation does not dispense an average monthly volume of more than 10,000 gallons of motor vehicle fuel per month.

7.8.5 Control Requirements and Work Practices

Control requirements are not set for the affected storage tank. However, there may be requirements for source-wide control requirements set forth in Condition 5.5.

7.8.6 Production and Emission Limitations

Production and emission limitations are not set for the affected storage tank. However, there are source-wide production and emission limitations set forth in Condition 5.6.

7.8.7 Testing Requirements

Testing requirements are not set for the affected storage tank. However, there are source-wide testing requirements in Condition 5.7 and general testing requirements in Condition 8.5.

7.8.8 Monitoring Requirements

Monitoring requirements are not set for the affected storage tanks. However, there may be provisions for source-wide monitoring requirements set forth in Condition 5.8 of this permit.

7.8.9 Recordkeeping Requirements

In addition to the records required by Condition 5.9, the Permittee shall maintain records of the following items for the affected storage tank to demonstrate compliance with Conditions 5.6 and 7.8.3, pursuant to Section 39.5(7)(b) of the Act:

a. The owner or operator of each storage vessel shall maintain readily accessible records of the dimension of the storage vessel and an analysis of the capacity of the storage vessel [35 IAC 218.129(f)];

b. Design information for the affected tank showing the presence of permanent submerged loading pipes;

c. Maintenance and repair records for the affected tank, as related to the repair or replacement of the loading pipes;

d. The gasoline throughput for the affected storage tank, gal/mo and gal/yr; and

e. The annual VOM emissions from the affected storage tank based on the recordkeeping requirements and compliance procedures of Condition 7.8.12.

7.8.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Air Compliance Unit, of deviations of the affected storage tank with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken:

Operation of the affected storage tank in deviation of requirements from Condition 7.8,3(b) within 30 days of such occurrence.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

Operational flexibility is not set for the affected storage tank. However, there may be provisions for source-wide operational flexibility set forth in Condition 5.11 of this permit.

7.8.12 Compliance Procedures

Compliance with the emission limit in Condition 6.6 shall be based on the following:

For the purpose of estimating VOM emissions from the affected tank, most current version of the TANKS program should be used.

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements which are promulgated after _____ (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

No permit revision shall be required for increases in emissions allowed under any USEPA approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for elsewhere in this permit and that are authorized by the applicable requirement [Section 39.5(7)(o)(vii) of the Act].

8.4 Operational Flexibility/Anticipated Operating Scenarios

8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

a. The changes do not violate applicable requirements;

b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements;

c. The changes do not constitute a modification under Title I of the CAA;

d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and

e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:

i. Describe the physical or operational change;

ii. Identify the schedule for implementing the physical or operational change;

iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;

iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and

v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods if applicable test methods are not specified by the applicable regulations or otherwise identified in the conditions of this permit. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Conditions 8.6.3 and 8.6.4.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

Reports summarizing required monitoring as specified in the conditions of this permit shall be submitted to the Illinois EPA every six months as follows, unless more frequent submittal of such reports is required in Sections 5 or 7 of this permit [Section 39.5(7)(f) of the Act]:

Monitoring Period	Report Due Date
January - June	September 1
July - December	March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

a. The name and identification of the affected unit(s);

b. The person(s) who will be performing sampling and analysis and their experience with similar tests;

c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;

d. The specific determinations of emissions and operation that are intended to be made, including sampling and monitoring locations;

e. The test method(s) that will be used, with the specific analysis method, if the method can be used with different analysis methods;

f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and

g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

a. The name and identification of the affected unit(s);

b. The date and time of the sampling or measurements;

c. The date any analyses were performed;

d. The name of the company that performed the tests and/or analyses;

e. The test and analytical methodologies used;

f. The results of the tests including raw data, and/or analyses including sample calculations;

g. The operating conditions at the time of the sampling or measurements; and

h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

a. Unless otherwise specified in the particular provision of this permit or in the written instructions distributed by the Illinois EPA for particular reports, reports and notifications shall be sent to the Illinois EPA - Air Compliance Unit with a copy sent to the Illinois EPA - Air Regional Field Office.

b. As of the date of issuance of this permit, the addresses of the offices that should generally be utilized for the submittal of reports and notifications are as follows:

i. Illinois EPA - Air Compliance Unit

Illinois Environmental Protection Agency
Bureau of Air
Compliance & Enforcement Section (MC 40)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Quality Planning Section

Illinois Environmental Protection Agency
Bureau of Air
Air Quality Planning Section (MC 39)
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

iii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency
Division of Air Pollution Control
9511 West Harrison
Des Plaines, Illinois 60016

iv. USEPA Region 5 - Air Branch

USEPA (AR - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

c. Permit applications should be addressed to the Air Permit Section. As of the date of issuance of this permit, the address of the Air Permit Section is as follows:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Permit Section (MC 11)
1021 North Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

8.7 Title I Conditions

Notwithstanding the expiration date on the first page of this CAAPP permit, Title I conditions in this permit, which are identified by a T1, T1N, or T1R designation, remain in effect until such time as the Illinois EPA takes action to revise or terminate them in accordance with applicable procedures for action on Title I conditions. This is because these conditions either: (a) incorporate conditions of earlier permits that were issued by the Illinois EPA pursuant to authority that includes authority found in Title I of the CAA (T1 conditions), (b) were newly established in this CAAPP permit pursuant to authority that includes such Title I authority (T1N conditions), or (c) reflect a revision or combination of conditions established in this CAAPP permit (T1R conditions). (See also Condition 1.5.)

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule.

9.1.2 In particular, this permit does not alter or affect the following [Section 39.5(7)(j)(iv) of the Act]:

a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;

b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and

d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.

9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, pursuant to Section 39.5(7)(j) and (p) of the Act, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless this permit provides for such continued operation consistent with the Act and applicable Illinois Pollution Control Board regulations [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated there under.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois, 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents as may be required by law and in accordance with constitutional limitations, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Sections 4 and 39.5(7)(a) and (p)(ii) of the Act]:

a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

d. Sample or monitor any substances or parameters at any location:

i. At reasonable times, for the purposes of assuring permit compliance or applicable requirements; or

ii. As otherwise authorized by the CAA, or the Act.

e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and

f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.

9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. At a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].

b. Other records required by this permit including any logs, plans, procedures, or instructions required to be kept by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Air Quality Planning Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be submitted to the Air Compliance Unit, Air Regional Field Office, and USEPA Region 5 – Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.

b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.

c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act and applicable regulations [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as Attachment 1 to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technology-based emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence [Section 39.5(7)(k) of the Act]:

i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency.

Note: For this purpose, emergency means a situation arising from sudden and reasonably unforeseeable events beyond the control of the source, as further defined by Section 39.5(7)(k)(iv) of the Act.

ii. The permitted source was at the time being properly operated;

iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and

iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.

b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations [Section 39.5(7)(k)(iv) of the Act].

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, revoked, reopened and reissued, or terminated for cause in accordance with applicable provisions of Section 39.5 of the Act. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit.

b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program.

c. The Illinois EPA or USEPA determines that this permit contains a material mistake or that inaccurate statement were made in establishing the emission standards or limitations, or other terms or conditions of this permit.

d. The Illinois EPA or USEPA determines that this permit must be revised or revoked to ensure compliance with the applicable requirements.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation and reissuance under Section 39.5(15) of the Act, pursuant to Sections 39.5(5)(e) and (i) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable. In the event of a challenge to any portion of the permit, other portions of the permit may continue to be in effect. Should any portion of this permit be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected and the rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

Upon the expiration of this permit, if the source is operated, it shall be deemed to be operating without a permit unless a timely and complete CAAPP application has been submitted for renewal of this permit. However, if a timely and complete application to renew this CAAPP permit has been submitted, the terms and all conditions of this CAAPP permit will remain in effect until the issuance of a renewal permit [Section 39.5(5)(l) and (o) of the Act].

Note: Pursuant to Sections 39.5(5)(h) and (n) of the Act, upon submittal of a timely and complete renewal application, the permitted source may continue to operate until final action is taken by the Illinois EPA on the renewal application, provided, however, that this protection shall cease if the applicant fails to submit any additional information necessary to evaluate or take final action on the renewal application as requested by the Illinois EPA in writing. For a renewal application to be timely, it must be submitted no later than 9 months prior to the date of permit expiration.

9.15 General Authority for the Terms and Conditions of this Permit

The authority for terms and conditions of this permit that do not include a citation for their authority is Section 39.5(7)(a) of the Act, which provides that the Illinois EPA shall include such provisions in a CAAPP permit as are necessary to accomplish the purposes of the Act and to assure compliance with all applicable requirements. Section 39.5(7)(a) of the Act is also another basis of authority for terms and conditions of this permit that do include a specific citation for their authority.

Note: This condition is included in this permit pursuant to Section 39.5(7)(n) of the Act.

10.0 ATTACHMENTS

Attachment 1 Example Certification by a Responsible Official

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature: _____

Name: _____

Official Title: _____

Telephone No.: _____

Date Signed: _____

Attachment 2 Emissions of Particulate Matter from Process Emission Units

a. New Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321].

b. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].

i. The emissions of particulate matter into the atmosphere in any one hour period from the affected coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A\ (P)^{B}$$

Where:

P = Process weight rate

E = Allowable emission rate

ii. For process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.214	2.54
B	0.534	0.534

iii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
B	0.16	0.16

c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

d. Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972

e. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].

f. The emissions of particulate matter into the atmosphere in any one hour period from the affected unit shall not exceed the allowable emission rates specified in the following equation:

$$E = C + A\ (P)^{B}$$

Where:

P = Process weight rate

E = Allowable emission rate

i. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
B	0.67	0.67
C	0	0

ii. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
B	0.11	0.11
C	-18.4	-40.0

g. Limits for Process Emission Units for which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.5	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00

270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

Attachment 3 Compliance Assurance Monitoring (CAM) Plan

There are no specific emission units that require a CAM plan as identified in the Monitoring Requirements of Subsection 8 for each Section 7, Unit Specific Conditions for Specific Emission Units.

Attachment 4 Guidance

The Illinois has prepared guidance for sources on the Clean Air Act Permit Program (CAAPP) that is available on the Internet site maintained by the Illinois EPA, www.epa.state.il.us. This guidance includes instructions on applying for a revision or renewal of the CAAPP permit.

Guidance On Revising A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-revising.pdf

Guidance On Renewing A CAAPP Permit:

www.epa.state.il.us/air/caapp/caapp-renewing.pdf

The application forms prepared by the Illinois EPA for the CAAPP are also available from the Illinois EPA's Internet site:

www.epa.state.il.us/air/caapp/index.html

These CAAPP application forms should also be used by a CAAPP source when it applies for a construction permit. For this purpose, the appropriate CAAPP application forms and other supporting information, should be accompanied by a completed Application For A Construction Permit form (199-CAAPP) and Fee Determination for Construction Permit Application form (197-FEE):

www.epa.state.il.us/air/caapp/199-caapp.pdf
www.epa.state.il.us/air/permits/197-fee.pdf

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